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and General Indemnity Company*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARSHA SWANSON, individually,

Plaintiff,

v.

USAA CASUALTY INSURANCE
COMPANY; USAA GENERAL
INDEMNITY COMPANY; DOES I through
X; and ROE CORPORATIONS I through X;
inclusive,
Defendant.

Case No. 2:22-cv-00311-RFB-EJY

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE
MOTION DEADLINE, PRE-
TRIAL ORDER AND TRIAL
READINESS CONFERENCE**

**(FIFTH REQUEST BY
STIPULATION)**

USAA Casualty Insurance Company (“USAA CIC”) and USAA General Indemnity Company (“USAA GIC” and together with USAA CIC collectively referred to as “Defendants”), by and through their counsel of record, Spencer Fane LLP, and Marsha Swanson (“Plaintiff”), by and through her counsel of record, Freidman Injury Law, PLLC, hereby stipulate and agree to extend certain case related deadlines to accommodate a mediation of the instant matter, tentatively scheduled for July 17, 2023.

A brief history of the action is below.

1. Defendants were served with a copy of the complaint through the Nevada Division of Insurance on January 26, 2022.

2. Defendants filed their answer on February 25, 2022. ECF 5.

3. The parties filed a joint status report on March 23, 2022. ECF 8.

4. The parties filed a scheduling order on April 12, 2022. ECF 10.

5. Since that time, the parties have diligently pursued discovery. Plaintiff and Defendants have sent each other written discovery, and Defendants have subpoenaed almost 20 of Plaintiff's medical providers.

6. The parties exchanged experts on January 23, 2023.

7. The parties exchanged rebuttal experts on February 21, 2023.

8. Defendants deposed Plaintiff.

9. Defendants deposed Plaintiff's treating doctor, Dr. Khavkin.

10. Plaintiff deposed Defendants' expert, Professor Thomas, on May 18, 2023.

11. Defendants deposed Plaintiff's expert, Mr. Strzelec, on June 8, 2023.

12. The parties have agreed to mediate this case with the benefit of the discovery they have received.

13. The parties have agreed to continue the dispositive motion, pre-trial order, and trial readiness deadlines by approximately three weeks. This extension is primarily sought to allow the parties to focus their attention on mediation instead of the dispositive motion deadline. If the case does not resolve, this extension allows for sufficient time for the parties to prepare their respective dispositive motions.

14. As relevant to this extension, the scheduling order set the following deadlines:

a. Discovery cutoff: June 22, 2023

b. Dispositive motions: July 24, 2023

c. Pre-trial order: August 24, 2023

15. After diligently pursuing discovery, and agreeing to mediate the case, the Parties request the deadlines set forth in paragraph 14(b,c) be extended approximately three weeks as set forth below:

a. Discovery cutoff: **N/A**

- b. Initial expert disclosures and interim status report: **N/A**
 - c. Rebuttal expert disclosures: **N/A**
 - d. Dispositive motions: **August 17, 2023**
 - e. Pre-trial order: **September 18, 2023**
 - f. Trial readiness: **October or November, 2023**
16. This is the parties' fifth request for an extension by stipulation.
17. No parties will be prejudiced by this brief extension.

Dated this 10th day of June, 2023.

Dated this 12th day of June, 2023.

FRIEDMAN INJURY LAW

SPENCER FANE LLP

/s/ Blake S. Friedman

/s/ Mary E. Bacon

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ORDER

IT IS SO ORDERED.



U.S. Magistrate Judge

Dated: June 12, 2023